

**Karen L. Willis, J.D.
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February 14, 2018

VIA EMAIL

The Hon. Judge Cathy Seibel
300 Quarropas St., Courtroom 621
White Plains, NY 10601-4150

AMENDED LETTER MOTION TO INTRODUCE NEWLY DISCOVERED EVIDENCE

Dear Hon. Judge Seibel:

Intervenor hereby amends her motion to introduce new evidence to add an additional supportive piece of evidence in support of the newly discovered trademark application for the Sixuvus's bonafide intent to perform (not as Village People) but as "The Kings of Disco.

This supportive piece of evidence is attached hereto as Exhibit A, wherein on February 4, 2018 and in the midst of the Sixuvus preliminary injunction hearing, Felipe Rose, President of the Sixuvus, Ltd., posted a **notice** to fans via his RealFelipeRose Facebook page that this is his "next solo performance as his group VP [Village People] transitions into a new name." What this means is that the Sixuvus knew all along that it intended to start performing as "The Kings of Disco" and discontinue use of Village People as they blatantly mislead the court into believing that if not allowed to continue performing as Village People, they would be irreparably harmed.

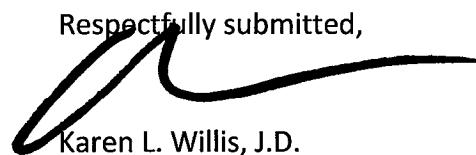
Well, the new evidence before the court clearly show the Sixuvus claim of a need to continuing performing as Village People, was simply a sham. And likely designed only to bring irreparable harm to Intervenor and Village People featuring Victor Willis who intend only to perform under Village People as exclusively licensed. The Sixuvus on the other hand, evidently, have other plans which entail them ceasing to perform live shows as Village People, and to "transition" into "The Kings of Disco," as sworn to in their application for intent to use with the U.S.P.T.O.

This Court must decide based on the evidence. Was the Sixuvus lying **then** to the U.S. Trademark Office when they swore of their intent to perform as "The Kings of Disco" under penalty of perjury? Or is the Sixuvus lying **now** to this Court when they claim a need to continue performing as Village People "for life." Which is it? This is a question that the court cannot ignore and this court should not turn a blind eye towards the Sixuvus and its counsels, **fraud on the court**.

This amendment and supporting evidence is astounding and **material** to deciding the motion for preliminary injunction. As your honor stated several times during the hearing, admission of evidence is liberally allowed during a preliminary injunction hearing. Here too, this newly discovered material evidence should likewise be received by the Court.

Accordingly, the Sixuvus motion for preliminary injunction and relevant supporting testimony must be rejected as unreliable and full of everything but the truth.

Respectfully submitted,



Karen L. Willis, J.D.

EXHIBIT A



Trademarks > Trademark Electronic Search System (TESS)

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THE KINGS OF DISCO

Word Mark	THE KINGS OF DISCO
Goods and Services	IC 041. US 100 101 107. G & S: Entertainment services in the nature of live musical performances; Entertainment services in the nature of live vocal performances by musical group; Live performances by a musical group
Standard Characters Claimed	
Mark Drawing Code	(4) STANDARD CHARACTER MARK
Serial Number	87581260
Filing Date	August 23, 2017
Current Basis	1B
Original Filing Basis	1B
Published for Opposition	January 9, 2018
Owner	(APPLICANT) Sixuvus, Ltd. CORPORATION NEW YORK 329 Tecumseh Avenue Mt. Vernon NEW YORK 10553
Attorney of Record	Sarah M. Matz
Type of Mark	SERVICE MARK
Register	PRINCIPAL
Live/Dead Indicator	LIVE

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https://www.facebook.com/Following-Felipe-175595535827162/?hc_ref=ARRDQ6-Y1STuJDWgksFCTJbT3WziqgntyIOy3iY5xCwS24_Nxe1Hxu_yJIQj0IfUjsg

Following Felipe

February 4 at 4:28pm

My next solo performance as my group VP, transitions into a new name.

Disco De Mayo: Macho Men Of Disco @ WestburyTheater on
May 5th, 2018

Starring:

Tavares

Harold Melvin's Blue Notes

Double Exposure

Felipe- Native American of
Village People fame

Disco Unlimited

Carl Carlton "Everlasting

George McCrae

"Rock Your Baby"

Gonzalez -

Haven't Stop Dancing Yet

Leroy Gomez-Don't Let Me Be

Misunderstood

Freddie James - "Get Up & Boogie"

Host Joe Causi

Host France Joli, "Special Guest/ Performance

For information - 516-247-5211

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